

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.	)	
	)	
Plaintiff	)	
v.	)	Case No.PJM 08 cv 0921
	)	
WORLD AVENUE USA, LLC, et al.	)	
Defendants	)	
_____	)	

**DEFENDANT WORLD AVENUE USA, LLC’S INTERIM SEALING MOTION AND  
INCORPORATED MEMORANDUM OF LAW**

Pursuant to the Stipulated Order Regarding Confidentiality of Discovery Materials (“Confidentiality Order”) [DE 97] and Local Rule 104(13) and 105(11) Defendant WORLD AVENUE USA, LLC (“WAUSA”), hereby moves to file under seal on an interim basis the un-redacted version of its Local Rule 104 Certification Regarding its Motion to Compel Complete Production of Documents from Hyptertouch, Inc. (“Hyptertouch”) Responsive to First Request for Production of Documents. In further support thereof, WAUSA states as follows:

1. WAUSA is filing a Local Rule 104 Certification Regarding its Motion to Compel Complete Production of Documents from Hyptertouch Responsive to First Request for Production of Documents.

2. WAUSA is filing in support of its Motion to Compel certain materials that Hyptertouch or other parties have designated pursuant to the Confidentiality Order as “Confidential.” These include Exhibits 7, 8, 9, and 10 of the Memorandum in Support of the of the Motion to Compel. Further, there are references to each of the foregoing throughout the text

of the Memorandum. Accordingly, these exhibits and portions of the Memorandum should be filed under seal.

3. Accordingly, WAUSA requests that the un-redacted version of Certification and the materials attached to the Certification be accepted as “Confidential” and filed under seal on an interim basis until otherwise adjudicated.

**WHEREFORE**, World Avenue USA, LLC respectfully requests the entry of an Order accepting the sealed filing until otherwise adjudicated, together with such other and further relief that this Court deems just and proper.

Dated: June 1, 2011.

Respectfully submitted,

*Attorneys for World Avenue USA, LLC*

GREENBERG TRAURIG, LLP

/s/

Sanford M. Saunders, Jr., Esq.

USDC, MD #4734

saunderss@gtlaw.com

Nicoleta Burlacu, Esq.

BurlacuN@gtlaw.com

*Admitted Pro Hac Vice*

GREENBERG TRAURIG, LLP

2101 L Street, NW, Suite 1000

Washington, DC 20037

Telephone: 202-331-3100

Facsimile: 202-331-3101

--and--

Kenneth Horky, Esq.

Florida Bar No. 691194

horkyk@gtlaw.com

John L. McManus, Esq.

Florida Bar No. 0119423

mcmanusj@gtlaw.com

*Admitted Pro Hac Vice*  
GREENBERG TRAURIG, P.A.  
401 East Las Olas Boulevard, Suite 2000  
Fort Lauderdale, FL 33301  
Telephone: 954-765-0500  
Facsimile: 954-765-1477

